

C.A. No. 24-12300

**IN THE UNITED STATES COURT OF APPEALS
FOR THE ELEVENTH CIRCUIT**

CITADEL SECURITIES LLC,

Petitioner,

v.

U.S. SECURITIES AND EXCHANGE COMMISSION,

Respondent,

CBOE BYX EXCHANGE, INC., ET AL., AND
CONSOLIDATED AUDIT TRAIL, LLC,

Intervenors.

On Petition for Review of an Action of the
United States Securities and Exchange Commission
SEC Release No. 34-100181

**INTERVENOR CONSOLIDATED AUDIT TRAIL, LLC'S
CERTIFICATE OF INTERESTED PERSONS**

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**CERTIFICATE OF INTERESTED PERSONS
AND CORPORATE DISCLOSURE STATEMENT**

Undersigned counsel represents Intervenor Consolidated Audit Trail, LLC. Pursuant to Eleventh Circuit Rule 26.1-1 through -3 and Federal Rule of Appellate Procedure 26.1, undersigned counsel hereby certifies that, to the best of his knowledge, the following persons and entities have an interest in this case:

1. ArentFox Schiff LLP, *Counsel for Intervenors Cboe BYX Exchange, Inc., Cboe BZX Exchange, Inc., Cboe C2 Exchange, Inc., Cboe EDGA Exchange, Inc., Cboe EDGX Exchange, Inc., and Cboe Exchange, Inc.*;
2. Ballard Spahr LLP, *Counsel for Intervenors Nasdaq BX, Inc., Nasdaq GEMX, LLC, Nasdaq ISE, LLC, Nasdaq MRX, LLC, Nasdaq PHLX LLC, and The Nasdaq Stock Market LLC*;
3. Barbero, Megan, *Counsel for Respondent*;
4. Borse Dubai Limited, *Owner of 10% or Greater Interest in Nasdaq, Inc.*;
5. BOX Exchange LLC, *Plan Participant of Intervenor Consolidated Audit Trail, LLC*;
6. Boyle, Gregory M., *Counsel for Intervenor Consolidated Audit Trail, LLC*;
7. Cboe BYX Exchange, Inc., *Intervenor and Plan Participant of Intervenor Consolidated Audit Trail, LLC*;
8. Cboe BZX Exchange, Inc., *Intervenor and Plan Participant of Intervenor Consolidated Audit Trail, LLC*;
9. Cboe C2 Exchange, Inc., *Intervenor and Plan Participant of Intervenor Consolidated Audit Trail, LLC*;
10. Cboe EDGA Exchange, Inc., *Intervenor and Plan Participant of Intervenor Consolidated Audit Trail, LLC*;

11. Cboe EDGX Exchange, Inc., *Intervenor and Plan Participant of Intervenor Consolidated Audit Trail, LLC*;
12. Cboe Exchange, Inc., *Intervenor and Plan Participant of Intervenor Consolidated Audit Trail, LLC*;
13. Cboe Global Markets, Inc. (BATS: CBOE), *Indirect Owner of 10% or Greater Interest in Intervenor Consolidated Audit Trail, LLC, and Direct or Indirect Parent Company of Cboe BYX Exchange, Inc., Cboe BZX Exchange, Inc., Cboe C2 Exchange, Inc., Cboe EDGA Exchange, Inc., Cboe EDGX Exchange, Inc., and Cboe Exchange, Inc.*;
14. Citadel Securities GP LLC, *Parent Company of Petitioner*;
15. Citadel Securities LLC, *Petitioner*;
16. Conley, Michael A., *Counsel for Respondent*;
17. Consolidated Audit Trail, LLC, *Intervenor*;
18. Deutsch, Elizabeth B., *Counsel for Intervenor Consolidated Audit Trail, LLC*;
19. Financial Industry Regulatory Authority, Inc., *Plan Participant of Intervenor Consolidated Audit Trail, LLC*;
20. Francisco, Noel J., *Counsel of Record for Petitioner*;
21. Gershengorn, Ian Heath, *Counsel of Record for Intervenor Consolidated Audit Trail, LLC*;
22. Greenwalt, Paul E. III, *Counsel of Record for Intervenor Cboe BYX Exchange, Inc., Cboe BZX Exchange, Inc., Cboe C2 Exchange, Inc., Cboe EDGA Exchange, Inc., Cboe EDGX Exchange, Inc., and Cboe Exchange, Inc.*;
23. Hardin, Tracey A., *Counsel for Respondent*;
24. Heckendorn, J. Maxwell, *Counsel for Intervenor Cboe BYX Exchange, Inc., Cboe BZX Exchange, Inc., Cboe C2 Exchange, Inc., Cboe EDGA Exchange, Inc., Cboe EDGX Exchange, Inc., and Cboe Exchange, Inc.*;

25. Hoyt, Joshua T., *Counsel for Petitioner*;
26. Intercontinental Exchange, Inc. (NYSE: ICE), *Indirect Owner of 10% or Greater Interest in Intervenor Consolidated Audit Trail, LLC, and Indirect Parent Company of New York Stock Exchange LLC, NYSE American LLC, NYSE Arca, Inc., NYSE Chicago, Inc., and NYSE National, Inc.*;
27. International Securities Exchange Holdings, Inc., *Parent Company of Nasdaq GEMX, LLC, Nasdaq ISE, LLC, and Nasdaq MRX, LLC*;
28. Investor AB (Nasdaq Stockholm: INVE B), *Owner of 10% or Greater Interest in Nasdaq, Inc.*,
29. Investors Exchange LLC, *Plan Participant of Intervenor Consolidated Audit Trail, LLC*;
30. Jenner & Block LLP, *Counsel for Intervenor Consolidated Audit Trail, LLC*;
31. Jones Day, *Counsel for Petitioner*;
32. Kastenberg, Stephen J., *Counsel for Intervenors Nasdaq BX, Inc., Nasdaq GEMX, LLC, Nasdaq ISE, LLC, Nasdaq MRX, LLC, Nasdaq PHLX LLC, and The Nasdaq Stock Market LLC*;
33. Lantieri, Paul III, *Counsel of Record for Intervenors Nasdaq BX, Inc., Nasdaq GEMX, LLC, Nasdaq ISE, LLC, Nasdaq MRX, LLC, Nasdaq PHLX LLC, and The Nasdaq Stock Market LLC*;
34. Long-Term Stock Exchange, Inc., *Plan Participant of Intervenor Consolidated Audit Trail, LLC*;
35. Lucas, Brinton, *Counsel for Petitioner*;
36. Marshall, Jonathan J., *Counsel for Intervenor Consolidated Audit Trail, LLC*;
37. Matro, Daniel E., *Counsel of Record for Respondent*;

38. MEMX LLC, *Plan Participant of Intervenor Consolidated Audit Trail, LLC*;
39. Miami International Securities Exchange LLC, *Plan Participant of Intervenor Consolidated Audit Trail, LLC*;
40. MIAX Emerald, LLC, *Plan Participant of Intervenor Consolidated Audit Trail, LLC*;
41. MIAX PEARL, LLC, *Plan Participant of Intervenor Consolidated Audit Trail, LLC*;
42. MIAX Sapphire, LLC, *Plan Participant of Intervenor Consolidated Audit Trail, LLC*;
43. Molzberger, Michael K., *Counsel for Intervenor Cboe BYX Exchange, Inc., Cboe BZX Exchange, Inc., Cboe C2 Exchange, Inc., Cboe EDGA Exchange, Inc., Cboe EDGX Exchange, Inc., and Cboe Exchange, Inc.*;
44. Nasdaq BX, Inc., *Intervenor and Plan Participant of Intervenor Consolidated Audit Trail, LLC*;
45. Nasdaq GEMX, LLC, *Intervenor and Plan Participant of Intervenor Consolidated Audit Trail, LLC*;
46. Nasdaq, Inc. (Nasdaq: NDAQ), *Parent Company of Nasdaq BX, Inc., Nasdaq PHLX LLC, and The Nasdaq Stock Market LLC*;
47. Nasdaq ISE, LLC, *Intervenor and Plan Participant of Intervenor Consolidated Audit Trail, LLC*;
48. Nasdaq MRX, LLC, *Intervenor and Plan Participant of Intervenor Consolidated Audit Trail, LLC*;
49. Nasdaq PHLX LLC, *Intervenor and Plan Participant of Intervenor Consolidated Audit Trail, LLC*;
50. New York Stock Exchange LLC, *Plan Participant of Intervenor Consolidated Audit Trail, LLC*;

51. NYSE American LLC, *Plan Participant of Intervenor Consolidated Audit Trail, LLC*;
52. NYSE Arca, Inc., *Plan Participant of Intervenor Consolidated Audit Trail, LLC*;
53. NYSE Chicago, Inc., *Plan Participant of Intervenor Consolidated Audit Trail, LLC*;
54. NYSE National, Inc., *Plan Participant of Intervenor Consolidated Audit Trail, LLC*;
55. Rabbitt, Brian C., *Counsel for Petitioner*;
56. Roth, Yaakov M., *Counsel for Petitioner*;
57. The Nasdaq Stock Market LLC, *Intervenor and Plan Participant of Intervenor Consolidated Audit Trail, LLC*;
58. The Vanguard Group, Inc., *Owner of 10% or Greater Interest in Cboe Global Markets, Inc.*;
59. Thoma Bravo, LP, *Owner of 10% or Greater Interest in Nasdaq, Inc.*;
60. Unikowsky, Adam G., *Counsel for Intervenor Consolidated Audit Trail, LLC*;
61. United States Securities and Exchange Commission, *Respondent*.

Pursuant to Federal Rule of Appellate Procedure 26.1 and Eleventh Circuit Rules 26.1-1 through -3, undersigned counsel for Intervenor Consolidated Audit Trail, LLC, hereby certifies that Consolidated Audit Trail, LLC, has no parent corporation, and that the following three publicly held companies have an indirect ownership interest in Consolidated Audit Trail, LLC, of 10% or more: Cboe Global

Markets, Inc. (BATS: CBOE); Intercontinental Exchange, Inc. (NYSE: ICE); and Nasdaq, Inc. (Nasdaq: NDAQ).

Date: November 5, 2024

/s/ Ian Heath Gershengorn

Ian Heath Gershengorn

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Consolidated Audit Trail, LLC